

From: [BURKHART Robert](#)
To: [MCDONNELL Erin](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
Subject: RE: Troutdale Energy Center Information Meeting
Date: 01/28/2013 05:19 PM

Hi Chip and Erin,

This energy project (Troutdale Energy Project, or TEC) has submitted an NPDES application for a permit to discharge wastewater to the Sandy River. Within the application they state that the project will be using local groundwater – up to about 5 million gallons per day – and that this will not interfere with the cleanup project. The use of this groundwater is fine from an NPDES-standpoint, but I just wanted to make sure you are aware of the situation.

Here is how the site background is described in the application (*Technical Evaluation Report for Development of an Individual NPDES Permit for the Troutdale Energy Center Troutdale, Oregon, Dec. 2012* CH2MHill):

“TRIP is the location of a former aluminum reduction plant owned and operated by Reynolds Metals Company and then Alcoa Inc. In 1994, the site was listed by the U.S. Environmental Protection Agency (EPA) as a Superfund site. Soils and groundwater remediation measures began in the 1990s. The EPA issued its Record of Decision in September 2006, indicating that the level of clean up within TRIP rendered the site suitable for industrial use, but not for residential or commercial use (EPA, 2006). In 2007, the Port of Portland purchased the property and the surrounding area and they had a property development environmental management plan prepared for its development as an industrial park (Ash Creek Associates, 2008). The Facility will constitute a reuse of a portion of the TRIP site as a beneficial reuse brownfield site, which is consistent with EPA standards for allowed uses. Currently, shallow groundwater extraction continues at specific areas of the TRIP site to capture and control the remnant fluoride from the former aluminum reduction plant (Ash Creek Associates, 2012). The Facility, by contrast, will utilize deep groundwater from the eastern edges of the TRIP site. This groundwater extraction for the Facility will not entrain any fluoride-contaminated shallow groundwater, and it will not interfere with the existing groundwater extraction areas of influence. Groundwater modeling and well designs are being performed for the Port of Portland (TRIP owners) to meet these requirements (GSI, 2012).”

If you would like to see the entire “Technical Evaluation Report”, just let me know.

Rob Burkhardt | Water Quality Specialist
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<http://www.oregon.gov/DEQ/>

From: MCDONNELL Erin
Sent: Monday, January 28, 2013 3:10 PM
To: BURKHART Robert
Subject: FW: Troutdale Energy Center Information Meeting

FYI

Erin McDonnell, P.E.
Cleanup Project Engineer
Oregon DEQ, NWR
503.229.6900

From: Humphrey.Chip@epamail.epa.gov [<mailto:Humphrey.Chip@epamail.epa.gov>]
Sent: Monday, January 28, 2013 9:24 AM
To: MCDONNELL Erin
Subject: Re: Troutdale Energy Center Information Meeting

Erin

Thanks for sending the info about this upcoming meeting. I'm not planning to attend, but agree that we'll need to look at the water quality permit info to see if it will affect the Superfund cleanup. I will be most interested in the groundwater extraction plan or analysis of impacts to the current groundwater remedy.

thanks
Chip

▼ MCDONNELL Erin ---01/17/2013 01:36:06 PM---Hi Chip, An information meeting for the Air and Water Quality permits for the proposed Troutdale Ene

From: MCDONNELL Erin <MCDONNELL.Erin@deq.state.or.us>
To: Chip Humphrey/R10/USEPA/US@EPA
Date: 01/17/2013 01:36 PM
Subject: Troutdale Energy Center Information Meeting

Hi Chip,

An information meeting for the Air and Water Quality permits for the proposed Troutdale Energy Center on the former Reynolds Metals site is scheduled for Wednesday, January 30th at 6:30pm in Troutdale:

http://www.deq.state.or.us/news/publicnotices/uploaded/130102_5136_PNinfoMeeting.pdf

Questions may be raised regarding how site redevelopment may impact the Superfund remedy and I have been asked to attend as a DEQ representative familiar with the cleanup/Superfund related issues at the site. I want to confirm that you are aware of this meeting and whether you plan to attend? In addition, please forward meeting information onto any other entities that may be interested. I have already spoke with Amy Pepper with the City of Troutdale and David Breen. I will forward this information onto Alcoa as well.

Information regarding the water quality permits has been submitted and will likely require DEQ Cleanup and EPA review to determine if the activities affects the Superfund remedy. Apparently the land disturbance permit proposes swales that may influence groundwater flow rates. Also, as discussed prior, it has been indicated that the proposed plant wants to extract groundwater for facility operations, however, to-date I have not been provided any

presentation on their proposed groundwater extraction plan or an impact analysis on the groundwater remedy.

Thank you,
Erin

Erin McDonnell, P.E.
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